

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CHAZZITY LESLIE,

CASE NO.: 0:24-cv-60097

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC., and DARRYL GIBSON,

Defendants.

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1441 *et seq.*, Defendants Experian Information Solutions, Inc. (“Experian”) and Darryl Gibson hereby file this Notice of Removal of the above-captioned action to this Court and states as follows:

1. Experian and Darryl Gibson are the named defendants in Civil Case No. COSO23007858, filed by Plaintiff Chazzity Leslie (“Plaintiff”) in the County Court of the Seventeenth Judicial Circuit in and for Broward County, Florida (hereinafter, “State Court Action”).

2. The Complaint in the State Court Action was filed with the Clerk of the County Court in and for Broward County on December 12, 2023. See **Exhibit A**.

3. This Notice is being filed with this Court within thirty (30) days after Experian was served on December 19, 2023, with a copy of Plaintiff’s initial pleading setting forth the claims for relief upon which Plaintiff’s action against Experian is based. See **Exhibit C**.

4. This Court is the proper district court for removal because the State Court Action is pending within this District.

5. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, orders, and other documents on file in the State Court Action are attached hereto as **Exhibits A–C**.

6. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a “consumer reporting agency” within the meaning of 15 U.S.C. § 1681a(f).

7. At the present time and at the time of the commencement of the State Court Action, Defendant Darryl Gibson is and was an individual citizen of the State of California and an employee of Experian.

8. The claims for relief against Experian that are alleged in the State Court Action arise under the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681 *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. Accordingly, the above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

9. Promptly after the filing of this Notice of Removal, Experian shall provide written notice of the removal to Plaintiff through her attorney of record in the State Court Action and shall file a copy of this Notice with the clerk of the Court in the State Court Action, as required by 28 U.S.C. § 1446(d).

Dated: January 17, 2024

/s/ Carly A. Roessler
Carly A. Roessler
Florida Bar No. 1024951
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*Attorney for Defendants Darryl Gibson and
Experian Information Solutions, Inc.*

CERTIFICATE OF SERVICE

I certify that on January 17, 2024, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court via CM/ECF, which will send notice of the same to all parties at the email addresses on file with the Clerk of Court. I further certify that the foregoing document is being served this day, by e-mail and U.S. mail, to Plaintiff at the following address:

Chazzity Leslie
7191 Park Street
Hollywood, Florida 33024
e-mail: MISSCHAZZITYL@gmail.com

/s/ Carly A. Roessler
Carly A. Roessler

*Attorney for Defendants Darryl Gibson and
Experian Information Solutions, Inc.*